

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

VERONICA BROWN,

Plaintiff,

-against-

ST. KITTS MARRIOTT RESORT AND THE
ROYAL BEACH CASINO and MARRIOTT
INTERNATIONAL, INC.,

Defendants.

Index No.: 1:14-cv-05960-SLT-MDG

**NOTICE FOR
DISCOVERY
AND INSPECTION**

COUNSELORS:

Pursuant to FRCP Rule 34 you are requested to produce the following documents:

1. Listing of names of officers and directors of Marriott International Inc. (MII), Royal St. Kitt's Beach Resort Ltd. (RSK) and Luxury Hotels International Management St. Kitt's Ltd. (LHI) as of July 2013.
2. Liability insurance policies covering personal injury accidents that accrued in July 2013 issued in favor of MII, RSK and LHI.
3. By laws of MII, RSK and LHI in effect July 2013.
4. Print, media, internet, television, and other advertising touting RSK or the St. Kitt's Marriott Resort Hotel as a vacation destination, published or made available in the City of New York January 2013 through June 2013.
5. Deed or lease to in effect July 2013 applicable to the St. Kitt's Marriott Hotel property.
6. Franchise agreements and licensing agreements between MII and RSK in effect July 2013.
7. Pictures depicting the subject St. Kitt's Marriott Resort Hotel taken January 2013 through July 2013 showing the lobby (and all signage), the entrance way (all signage) and all signs containing the "Marriott" name.
8. Rules of operation of RSK and LHI in effect July 2013.
9. Rules and Regulations of RSK or St. Kitt's Marriott Resort Hotel in effect July 2013 as to

maintenance and up keep of the guest rooms including the air conditioners.

10. Personnel policies of RSK and MII including names of hiring officers and their employer's name January 2013 to June 2013.

11. Documents revealing who paid the advertising budget of RSK or for the St. Kitt's Marriott Hotel January 2013 to July 2013.

12. Print out of venues and index numbers of all personal injury cases in the United States and Federal Courts wherein defendant MII, and RSK or LHI are named defendant's for accidents that accrued January 1, 2010 through July 1, 2013.

13. Names and addresses of accountants for MII, RSK, and LHI for tax years 2010, 2011, 2012 and 2013.

14. Tax forms showing gross Revenue for RSK in 2012 and 2013, and the portion if any paid to defendant MII.

15. Any notices, publications, disclaimers or information issued to guests or prospective guests in 2012 and 2013 at the St. Kitt's Marriott Resort, indicating that Marriott International Inc., does not own, operate or manage the St. Kitt's Marriott Resort and the Royal Beach Casino.

16. The Marriott International Inc. 2012 and 2013 annual report to the Securities and Exchange Commission.

17. The Marriott International, Inc. 2012 and 2013 annual report to shareholders.

18. Listing of how many of Marriott International, Inc. Hotels are wholly owned by Marriott International, Inc.

19. Listing of Marriott International Inc. hotels that were managed by Marriott International Inc., in 2011, 2012, and 2013.

20. Disclaimers published by MII in 2011, 2012, and 2013 indicating that MII is not responsible for accidents that occur at the St. Kitt's Marriott Hotel property.

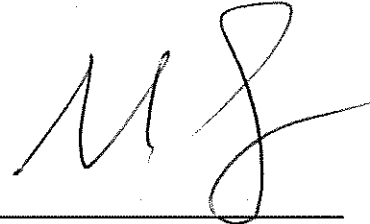
21. Listing of any subsidiary Marriott Corporation entities that are involved at or associated with the St. Kitt's Hotel, other than Marriott International, Inc.
22. Documents showing when Veronica Brown, paid her Hotel bill at the St. Kitt's Marriott Hotel in July 2013/or whose account said payment was credited to.
23. Any publication, literature or any other information given to the general public by Marriott International, Inc. that notifies its guests at the St. Kitt's Marriott Hotel, that in the event of an accident causing injury at said Hotel, the guests would be required to bring a legal proceeding in St. Kitt's, and would be barred from bringing a proceeding in the United States in the jurisdiction in which they reside.
24. Documents showing the gross revenues for Marriott International, Inc. for the tax years 2012 and 2013.
25. List of all Hotels that Marriott International Inc. has under its umbrella.
26. List of countries in which Marriott International Inc. operates Hotels.
27. Records of maintenance performed July 2011 through August 2013 at the St. Kitt's Marriott Hotel Room 455, regarding the air conditioning or the air conditioning vents.
28. Documents showing from July 2011 to July 2013 how many times did maintenance at the St. Kitt's Marriott Hotel fix any air conditioner or air conditioning vent in any room at said St. Kitt's Marriott Hotel.
29. St. Kitt's Marriott Hotel floor plans showing number of guests rooms in 2012 and 2013.
30. The names and addresses of all corporations or other entities who by contractual relationships either oral or written pay money to Marriott International, Inc. for operations at the St. Kitt's Marriott Resort.
31. Samples of Stationary provided to guests at the St. Kitt's Marriott Hotel in 2012 and 2013.
32. Copy of ad in the St. Kitt's phone directory for the St. Kitt's Marriott Hotel in the 2011, 2012 and 2013 books.

PLEASE TAKE FURTHER NOTICE, that the foregoing is a continuing Demand. If any of the above demanded items are obtained subsequent to the service of this Notice, said items are to be furnished to the undersigned whenever obtained, but in any event, no less than (30) days prior to the trial of this action.

PLEASE TAKE FURTHER NOTICE, that in the event of your failure to comply with this Notice, a motion will be made to the Court for appropriate sanctions, including but not limited to the striking of pleadings.

Dated: New York, New York
March 4, 2015

Yours, etc.,

A handwritten signature in black ink, appearing to be 'MS' with a long horizontal stroke extending to the right.

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